

Moore & Van Allen

Lou M. Agosto
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Moore & Van Allen PLLC

Suite 4700
100 North Tryon Street
Charlotte, NC 28202-4003

October 13, 2005

VIA TELECOPY (248-813-2670) AND
OVERNIGHT DELIVERY

Delphi Corporation
5725 Delphi Drive
Troy, Michigan 48098-2815
Attn: John D. Sheehan

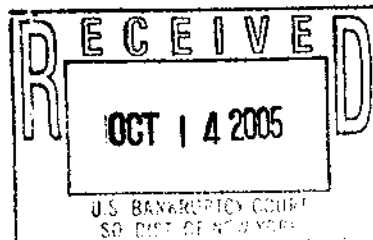
Delphi Delco Electronics
Plant # 39
601 Juaquin Cavazos R.
Los Indios, Texas 78567
Attn: Mr. Ben Baron

Re: In re Delphi Corporation et al.
United States Bankruptcy Court
Southern District of New York, Case No. 05-4481
Notice and Demand by Tadiran Batteries to Reclaim Goods

Dear Gentlemen:

This firm has been retained by Tadiran Batteries ("Tadiran") with respect to certain indebtedness owed by Delphi Delco Electronics ("Delphi") to Tadiran. We have been informed that Delphi received goods on credit from Tadiran while insolvent.

Pursuant to the provisions of 11 U.S.C. § 546(c)(1) and Section 2-702(2) of the Uniform Commercial Code, Tadiran hereby reclaims the goods shipped by Tadiran to Delphi and received by Delphi (i) within the ten-day period immediately preceding the filing of Delphi's bankruptcy petition and (ii) at any time since the date on which Delphi's bankruptcy petition was filed. Upon information and belief, Tadiran is entitled to and hereby does reclaim goods shipped to Delphi under the following invoices (the "Reclaimed Goods"), copies of which are attached hereto:



Delphi Corporation
Delphi Delco Electronics
October 13, 2005
Page 2

<u>Invoice Number</u>	<u>Invoice Date</u>	<u>Invoice Amount</u>
0248924-IN	09/27/05	\$ 4,740.00
0248925-IN	09/27/05	\$11,200.00
0248977-IN	10/06/05	\$ 3,555.00
0248978-IN	10/06/05	\$ 8,400.00

Tadiran hereby demands that Delphi segregate and identify the Reclaimed Goods and that Delphi refrain from using the Reclaimed Goods pending the return of the Reclaimed Goods to Tadiran or until this matter has been otherwise resolved. If Delphi's records of the property received from Tadiran during the applicable ten-day period are different, please promptly provide an accounting to me within ten days. Otherwise, we will assume that the above list of invoices properly identifies the Reclaimed Goods received by Delphi during the ten-day period and that all of the Reclaimed Goods are in Delphi's possession and have been identified and segregated.

In accordance with the provisions of Section 546(c) of the Bankruptcy Code, Tadiran requests that Delphi return the Reclaimed Goods to Tadiran or, as may be appropriate, take adequate steps to ensure that this reclamation claim is secured by a lien on Delphi's assets or is granted priority as a Section 503(b)(1) administrative expense in Delphi's bankruptcy case.

Please contact me as soon as possible to arrange for Tadiran to recover its Reclaimed Goods pursuant to this reclamation demand.

Very truly yours,

Moore & Van Allen PLLC



Lou Agosto

Enclosures

cc: VIA TELECOPY (212-735-2000) AND OVERNIGHT DELIVERY
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, New York 10036
Attn: Kayalyn A. Marafioti
Thomas J. Matz

Delphi Corporation
Delphi Delco Electronics
October 13, 2005
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VIA TELECOPY (312-407-0411) AND OVERNIGHT DELIVERY

Skadden, Arps, Slate, Meagher & Flom LLP
333 West Wacker Drive
Suite 2100
Chicago, IL 60606
Attn: John Wm. Butler Jr.
John K. Lyons
Ron E. Meisler

VIA OVERNIGHT DELIVERY

Clerk of Court
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004



2 Seaview Blvd.
Port Washington, N.Y. 11050

INVOICE

INVOICE NUMBER: 0248924-IN
APPLICATION CODE: 010040

ISRAEL PO: 1161975
INVOICE DATE: 09/27/2005

ORDER NUMBER: 0117837

ORDER DATE: 07/04/2004

SALESPERSON: 0365
CUSTOMER NO: 00-0307199

Customer

SOLD TO:

Delphi Delco Electronics
Plant#39 Att: Mr. Ben Baron
601 Juquin Cavazos R.
Los Indios, TX 78567
USA

SHIP TO:

Delphi Delco Electronics
Plant#27
601 Juquin Cavazos R.
Los Indios, TX 78567
USA

CONFIRM TO:

CUSTOMER P.O. 550056758	SHIP VIA BAX GLOBAL COLL	F.O.B.	TERMS 10 days 1%		TERRITORY C	
ITEM NO.	UNIT	ORDERED	SHIPPED	BACK ORD	PRICE	AMOUNT
15495152405 TLH-4951/TPH	PC	1,500 WHSE: 000	1,500	0	2.37	3,555.00
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	500	1,500	2.37	1,185.00
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,500 WHSE: 000	0	2,500	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,500 WHSE: 000	0	2,500	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,500 WHSE: 000	0	2,500	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	

Net Invoice: 4,740.00

Freight: 0.00

Invoice Total: 4,740.00

This sale is subject to Tadiran Batteries' standard terms and conditions as printed on the enclosed sheet.

**TADIRAN
BATTERIES**2 Seaview Blvd.
Port Washington, N.Y. 11050**INVOICE**INVOICE NUMBER: 0248925-IN
APPLICATION CODE: 010050
ISRAEL PO: 1160397
INVOICE DATE: 09/27/2005
ORDER NUMBER: 0116226ORDER DATE: 09/25/2002
SALESPERSON: 0365
CUSTOMER NO: 00-0307199

Customer

SOLD TO:
Delphi Delco Electronics
Plant#39 Att: Mr. Ben Baron
601 Juquin Cavazos R.
Los Indios, TX 78567
USASHIP TO:
Delphi Delco Electronics
702 Juquin Cavazos R.
Los Indios, TX 78567
USA

CONFIRM TO:

CUSTOMER P.O. 550046922	SHIP VIA BAX GLOBAL COLL	F.O.B.	TERMS 10 days 1%	TERRITORY C		
ITEM NO.	UNIT	ORDERED	SHIPPED	BACK ORD	PRICE	AMOUNT
15498643005 TLH-4986/P	PC	2,000 WHSE: 000	2,000	0	2.80	5,600.00
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	2,000	3,000	2.80	5,600.00
15498643005 TLH-4986/P	PC	4,000 WHSE: 000	0	4,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	6,000 WHSE: 000	0	6,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	7,000 WHSE: 000	0	7,000	2.80	
15498643005 TLH-4986/P	PC	6,000 WHSE: 000	0	6,000	2.80	
15498643005 TLH-4986/P	PC	6,000 WHSE: 000	0	6,000	2.80	
15498643005 TLH-4986/P	PC	3,000 WHSE: 000	0	3,000	2.80	



**TADIRAN
BATTERIES**

2 Seaview Blvd.
Port Washington, N.Y. 11050

INVOICE

INVOICE NUMBER: 0248925-IN
APPLICATION CODE: 010050
ISRAEL PO: 1160397
INVOICE DATE: 09/27/2005
ORDER NUMBER: 0116226

ORDER DATE: 09/25/2002

SALESPERSON: 0365
CUSTOMER NO: 00-0307199

Customer

SOLD TO:
Delphi Delco Electronics
Plant#39 Att: Mr. Ben Baron
601 Juquin Cavazos R.
Los Indios, TX 78567
USA

SHIP TO:
Delphi Delco Electronics
702 Juquin Cavazos R.
Los Indios, TX 78567
USA

CONFIRM TO:

CUSTOMER P.O. 550046922	SHIP VIA BAX GLOBAL COLL	F.O.B.	TERMS 10 days 1%	TERRITORY C.
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ITEM NO.	UNIT	ORDERED	SHIPPED	BACK ORD	PRICE	AMOUNT
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This sale is subject to Tadiran Batteries' standard terms and conditions as printed on the enclosed sheet.

Net Invoice:	11,200.00
Freight:	0.00
Invoice Total:	11,200.00



INVOICE

INVOICE NUMBER: 0248977-IN
APPLICATION CODE: 010040
ISRAEL PO: 1161975
INVOICE DATE: 10/06/2005
ORDER NUMBER: 0117837

ORDER DATE: 07/04/2004

SALESPERSON: 0365
CUSTOMER NO: 00-0307199

Customer

SOLD TO:
Delphi Delco Electronics
Plant#39 Att: Mr. Ben Baron
601 Juaquin Cavazos R.
Los Indios, TX 78567
USA

SHIP TO:
Delphi Delco Electronics
Plant#27
601 Juaquin Cavazos R.
Los Indios, TX 78567
USA

CONFIRM TO:

CUSTOMER P.O. 550056758	SHIP VIA BAX GLOBAL COLL	F.O.B.	TERMS 10 days 1%		TERRITORY C	
ITEM NO.	UNIT	ORDERED	SHIPPED	BACK ORD	PRICE	AMOUNT
15495152405 TLH-4951/TPH	PC	1,500 WHSE: 000	1,500	0	2.37	3,555.00
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,500 WHSE: 000	0	2,500	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,500 WHSE: 000	0	2,500	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,500 WHSE: 000	0	2,500	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	
15495152405 TLH-4951/TPH	PC	2,500 WHSE: 000	0	2,500	2.37	
15495152405 TLH-4951/TPH	PC	2,000 WHSE: 000	0	2,000	2.37	

Net Invoice: 3,555.00

Freight: 0.00

Invoice Total: 3,555.00

This sale is subject to Tadiran Batteries' standard terms and conditions as printed on the enclosed sheet.



2 Seaview Blvd.
Port Washington, N.Y. 11050

INVOICE

INVOICE NUMBER: 0248978-IN
APPLICATION CODE: 010050
ISRAEL PO: 1160397
INVOICE DATE: 10/06/2005
ORDER NUMBER: 0116226

ORDER DATE: 09/25/2002

SALESPERSON: 0365
CUSTOMER NO: 00-0307199

Customer

SOLD TO:
Delphi Delco Electronics
Plant#39 Att: Mr. Ben Baron
601 Juaquin Cavazos R.
Los Indios, TX 78567
USA

SHIP TO:
Delphi Delco Electronics
702 Juaquin Cavazos R.
Los Indios, TX 78567
USA

CONFIRM TO:

CUSTOMER P.O. 550046922	SHIP VIA BAX GLOBAL COLL	F.O.B.	TERMS 10 days 1%	TERRITORY C		
ITEM NO.	UNIT	ORDERED	SHIPPED	BACK ORD	PRICE	AMOUNT
15498643005 TLH-4986/P	PC	3,000 WHSE: 000	3,000	0	2.80	8,400.00
15498643005 TLH-4986/P	PC	4,000 WHSE: 000	0	4,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	6,000 WHSE: 000	0	6,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	5,000 WHSE: 000	0	5,000	2.80	
15498643005 TLH-4986/P	PC	7,000 WHSE: 000	0	7,000	2.80	
15498643005 TLH-4986/P	PC	6,000 WHSE: 000	0	6,000	2.80	
15498643005 TLH-4986/P	PC	6,000 WHSE: 000	0	6,000	2.80	
15498643005 TLH-4986/P	PC	3,000 WHSE: 000	0	3,000	2.80	



**TADIRAN
BATTERIES**

2 Seaview Blvd.
Port Washington, N.Y. 11050

INVOICE

INVOICE NUMBER: 0248978-IN
APPLICATION CODE: 010050
ISRAEL PO: 1160397
INVOICE DATE: 10/06/2005
ORDER NUMBER: 0116226

ORDER DATE: 09/25/2002
SALESPERSON: 0365
CUSTOMER NO: 00-0307199

Customer

SOLD TO:
Delphi Delco Electronics
Plant#39 Att: Mr. Ben Baron
601 Juquin Cavazos R.
Los Indios, TX 78567
USA

SHIP TO:
Delphi Delco Electronics
702 Juquin Cavazos R.
Los Indios, TX 78567
USA

CONFIRM TO:

CUSTOMER P.O. 550046922	SHIP VIA BAX GLOBAL COLL	F.O.B.	TERMS 10 days 1%	TERRITORY C		
ITEM NO.	UNIT	ORDERED	SHIPPED	BACK ORD	PRICE	AMOUNT

This sale is subject to Tadiran Batteries' standard terms and conditions as printed on the enclosed sheet.

Net Invoice: 8,400.00
Freight: 0.00
Invoice Total: 8,400.00